

Feb 16, 2022

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. **22-20055-CR-GRAHAM/MCALILEY**

18 U.S.C. § 1029(a)(2)

18 U.S.C. § 1028A(a)(1)

UNITED STATES OF AMERICA

vs.

VANESSA WRIGHT,

Defendant.

INDICTMENT

The Grand Jury charges that:

COUNT 1

(Use of an Unauthorized Access Device - 18 U.S.C. § 1029(a)(2))

On or about May 10, 2021, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

VANESSA WRIGHT,

did knowingly, and with the intent to defraud, use an unauthorized access device, that is, a Capital One credit card account number ending in 0020 linked to the credit account of an individual whose initials are S.F., and by such conduct did, during any one-year period, obtain anything of value aggregating \$1,000 or more during that period, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 1029(a)(2).

COUNT 2

(Aggravated Identity Theft - 18 U.S.C. § 1028A(a)(1))

On or about May 10, 2021, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

VANESSA WRIGHT,

during and in relation to a felony violation of Title 18, United States Code, Section 1029(a)(2), that is, access device fraud, as charged in Count 1 of this Indictment, did knowingly transfer, possess and use, without lawful authority, a means of identification of another person, that is, a Capital One credit card account number ending in 0020 linked to the credit account of an individual whose initials are S.F., in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT 3

(Use of an Unauthorized Access Device - 18 U.S.C. § 1029(a)(2))

From on or about June 19, 2021, through on or about June 21, 2021, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

VANESSA WRIGHT,

did knowingly, and with the intent to defraud, use an unauthorized access device, that is, a Capital One credit card account number ending in 6349 linked to the credit account of an individual whose initials are S.F., and by such conduct did, during any one-year period, obtain anything of value aggregating \$1,000 or more during that period, said conduct, affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 1029(a)(2).

COUNT 4

(Aggravated Identity Theft - 18 U.S.C. § 1028A(a)(1))

From on or about June 19, 2021, through on or about June 21, 2021, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

VANESSA WRIGHT,

during and in relation to a felony violation of Title 18, United States Code, Section 1029(a)(2), that is, access device fraud, as charged in Count 3 of this Indictment, did knowingly transfer, possess and use, without lawful authority, a means of identification of another person, that is, a

Capital One credit card account number ending in 6349 linked to the credit account of an individual whose initials are S.F., in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT 5

(Use of an Unauthorized Access Device - 18 U.S.C. § 1029(a)(2))

From on or about June 26, 2021, through on or about June 28, 2021, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

VANESSA WRIGHT,

did knowingly, and with the intent to defraud, use an unauthorized access device, that is, a Capital One credit card account number ending in 5240 linked to the credit account of an individual whose initials are S.F., and by such conduct did, during any one-year period, obtain anything of value aggregating \$1,000 or more during that period, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 1029(a)(2).

COUNT 6

(Aggravated Identity Theft - 18 U.S.C. § 1028A(a)(1))

From on or about June 26, 2021, through on or about June 28, 2021, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

VANESSA WRIGHT,

during and in relation to a felony violation of Title 18, United States Code, Section 1029(a)(2), that is, access device fraud, as charged in Count 5 of this Indictment, did knowingly transfer, possess and use, without lawful authority, a means of identification of another person, that is, a Capital One credit card account number ending in 5240 linked to the credit account of an individual whose initials are S.F., in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT 7

(Use of an Unauthorized Access Device - 18 U.S.C. § 1029(a)(2))

On or about July 20, 2021, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

VANESSA WRIGHT,

did knowingly, and with the intent to defraud, use an unauthorized access device, that is, Capital One credit card account number ending in 4755 linked to the credit account of an individual whose initials are S.F., and by such conduct did, during any one-year period, obtain anything of value aggregating \$1,000 or more during that period, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 1029(a)(2).

[Remainder of page left intentionally blank.]

COUNT 8

(Aggravated Identity Theft - 18 U.S.C. § 1028A(a)(1))


On or about July 20, 2021, in Miami-Dade County, in the Southern District of Florida,
and elsewhere, the defendant,

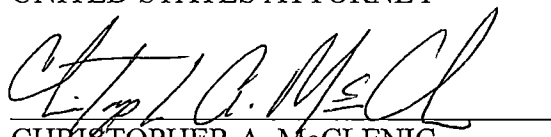
VANESSA WRIGHT,

during and in relation to a felony violation of Title 18, United States Code, Section 1029(a)(2),
that is, access device fraud, as charged in Count 7 of this Indictment, did knowingly transfer,
possess and use, without lawful authority, a means of identification of another person, that is, a
Capital One credit card account number ending in 4755 linked to the credit account of an individual
whose initials are S.F., in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

A TRUE BILL

FOREPERSON


JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY


CHRISTOPHER A. McCLENIC
SPECIAL ASSISTANT UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

CASE NO. _____

v.
VANESSA WRIGHT,**CERTIFICATE OF TRIAL ATTORNEY*****Superseding Case Information:**_____
Defendant. /**Court Division:** (Select One)☒ Miami ☐ Key West ☐ FTL
☐ WPB ☐ FTPNew defendant(s) ☐ Yes ☐ No

Number of new defendants _____

Total number of counts _____

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.

3. Interpreter: (Yes or No) No
List language and/or dialect English

4. This case will take 3 days for the parties to try.

5. Please check appropriate category and type of offense listed below:

(Check only one)

I	0 to 5 days	<input checked="" type="checkbox"/>
II	6 to 10 days	<input type="checkbox"/>
III	11 to 20 days	<input type="checkbox"/>
IV	21 to 60 days	<input type="checkbox"/>
V	61 days and over	<input type="checkbox"/>

(Check only one)

Petty	<input type="checkbox"/>
Minor	<input type="checkbox"/>
Misdemeanor	<input type="checkbox"/>
Felony	<input checked="" type="checkbox"/>

6. Has this case previously been filed in this District Court? (Yes or No) No

If yes: Judge _____ Case No. _____

(Attach copy of dispositive order)

Has a complaint been filed in this matter? (Yes or No) No

If yes: Magistrate Case No. _____

Related miscellaneous numbers: _____

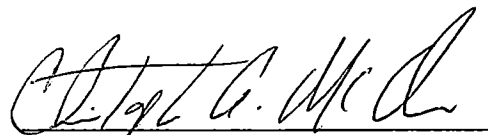
Defendant(s) in federal custody as of _____

Defendant(s) in state custody as of _____

Rule 20 from the District of _____

Is this a potential death penalty case? (Yes or No) No

7. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to August 9, 2013 (Mag. Judge Alicia O. Valle)? (Yes or No) No
8. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shanick Maynard)? (Yes or No) No
9. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared Strauss)? (Yes or No) No



CHRISTOPHER A. McCLENIC

Special Assistant United States Attorney

Court ID No. A5502599

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: VANESSA WRIGHT

Case No: _____

Counts: 1, 3, 5 & 7

Use of Unauthorized Access Devices

18 U.S.C. § 1029(a)(2)

*** Max. Penalty:** Ten (10) years' imprisonment; three (3) years' supervised release; \$250,000 fine.

Counts: 2, 4, 6 & 8

Aggravated Identity Theft

18 U.S.C. § 1028A(a)(1)

***Max. Penalty:** Mandatory minimum two (2) years' imprisonment consecutive to any other term of imprisonment; one (1) year supervised release; \$250,000 fine.

Count:

***Max. Penalty:** _____

Count:

***Max. Penalty:** _____

*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms or forfeitures that may be applicable.